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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 **United States of America,**
19 Plaintiff,
20 v.
21 **Csaba John Csukás,**
22 Defendant.

23 Case No.: CR 24-152 WHO

24
**Defendant's Additional Proposed
25 Jury Instruction**

26 In light of the Court's recent ruling, which limited the number of character witnesses Mr.
27 Csukás is permitted to call, the defense respectfully requests the Court provide the jury with the
28 following additional instruction:

1 **INSTRUCTION NO. __**

2 You have heard testimony from defense witnesses with respect to the defendant's
3 character. You may have noticed a limited number of character witnesses were presented. The
4 Court has ordered the defendant to present only two character witnesses. This limitation does
5 not reflect on the credibility of the witnesses or the character of the defendant. In evaluating
6 the character witnesses' testimony and/or the character of the defendant, you are to draw no
7 inferences from the number of witnesses who testified.

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12 Dated: October 27, 2024

Respectfully submitted,

13 JODI LINKER
14 Federal Public Defender
15 Northern District of California

16 _____
17 /S
18 CANDIS MITCHELL
19 ELISSE LAROUCHE
20 Assistant Federal Public Defender